

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of	}	
	}	CC Docket No. 99-200
Number Resource Optimization	}	

Reply Comments of the Louisiana Public Service Commission

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Date: November 15, 2001

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Reply Comments of the Louisiana Public Service Commission

The Louisiana Public Service Commission (“LPSC”) respectfully submits its Reply Comments to the comments submitted to the Commission regarding the proposed national thousands-block number pooling rollout schedule released by the Commission in a *Public Notice* dated October 17, 2001 in the above-captioned proceeding.¹

1. Prioritization of NPAs Facing Early Exhaust

¹*The Common Carrier Bureau Seeks Comment on the National Thousands-Block Number Pooling Rollout Schedule*, CC Docket No. 99-200, *Public Notice*, DA 01-2419 (released October 17, 2001).

The LPSC concurs with the comments filed by BellSouth Corporation² that the proposed national rollout schedule is very aggressive; however, the LPSC does agree with the Commissions decision³ to begin pooling of the 318 NPA during the Third Quarter of the national rollout. The LPSC requested in a *Petition*⁴ dated July 3, 2001, that the LPSC be granted expedited and high priority status for the 318 NPA and resulting NPA in the national implementation schedule. The 318 NPA, although not part of a top-100 MSA, falls under the Shreveport-Bossier City, Louisiana MSA (#104)⁵ was expected to face exhaustion by the 3rd Quarter 2004⁶ (revised projections⁷ forecast 2nd Quarter 2005 exhaust). The Baton Rouge, Louisiana MSA is a top 100 MSAs per the 2000 U.S. Census⁸ and is included in the 225 NPA. Latest projections⁹ had the 225 NPA exhausting during

²*In the Matter of Resource Optimization*, CC Docket No. 99-200, *BellSouth Comments to The Common Carrier Bureau Seeks Comment on the National Thousands-Block Number Pooling Rollout Schedule*, CC Docket No. 99-200, Public Notice, DA 01-2419 (released October 17, 2001).

³*The Common Carrier Bureau Seeks Comment on the National Thousands-Block Number Pooling Rollout Schedule*, CC Docket No. 99-200, Public Notice, DA 01-2419 (released October 17, 2001).

⁴*Petition of the Louisiana Public Service Commission for Expedited Decision for Additional Delegated Authority to Implement Number Conservation Measures Regarding Area Code 318*, CC Docket No. 99-200, July 3, 2001.

⁵Source: Population Estimates Program, Population Division, U.S. Census Bureau, Washington, DC 20233

⁶*North American Numbering Plan Administration, 2001 NRUF and NPA Exhaust Analysis*, June 1, 2001 Update.

⁷*North American Numbering Plan Administration, 2001 NPA Exhaust Analysis*, Changes as of November 5, 2001.

⁸Source: Population Estimates Program, Population Division, U.S. Census Bureau, Washington, DC 20233

⁹*North American Numbering Plan Administration, 2001 NRUF and NPA Exhaust*

the 2nd Quarter 2013. Therefore, the LPSC requested that the Commission move the 318 NPA ahead of the 225 NPA in the national rollout; and the Commission did move¹⁰ pooling of the 318 NPA into the Third Quarter of the national rollout.

2. Pooling Rate Centers Within the NPA vs. Pooling Entire NPA

Analysis, June 1, 2001 Update.

¹⁰*The Common Carrier Bureau Seeks Comment on the National Thousands-Block Number Pooling Rollout Schedule*, CC Docket No. 99-200, *Public Notice*, DA 01-2419 (released October 17, 2001).

The LPSC agrees with the comments filed on behalf of Verizon Communications, Inc.¹¹ and SBC Communications, Inc.¹² supporting implementation of pooling in the entire NPA as opposed to only the portion of the NPA. The LPSC believes that pooling only selected rate centers in an NPA would require industry to come back at a later date to complete pooling of the NPA even though pooling could be more easily done in one step at the outset. Pooling of the entire NPA at the beginning of the pooling process would prove to be more efficient and provide a consistent process for both service providers and the pooling administrator.

3. National Cost Recovery Mechanism

The LPSC is interested in the resolution of the national cost recovery issue associated with thousands-block number pooling. As such, it believes this issue should be finalized prior to the implementation of the proposed rollout schedule.

IV. Summary

The LPSC believes that the Commission has adopted an aggressive rollout schedule for national thousands-block number pooling. The Commission's decision to move the 318 NPA up into the Third Quarter of the national rollout is supported by the LPSC as the 318 NPA, although not effective in a top-100 MSA, is projected to exhaust years ahead of the 225 NPA in Louisiana.

¹¹*In the Matter of Resource Optimization*, CC Docket No. 99-200, *Comments of Verizon* to The Common Carrier Bureau Seeks Comment on the National Thousands-Block Number Pooling Rollout Schedule, CC Docket No. 99-200, Public Notice, DA 01-2419 (released October 17, 2001).

¹²*In the Matter of Resource Optimization*, CC Docket No. 99-200, *Comments of SBC Communications, Inc.* to The Common Carrier Bureau Seeks Comment on the National Thousands-Block Number Pooling Rollout Schedule, CC Docket No. 99-200, Public Notice, DA 01-2419 (released October 17, 2001).

The LPSC supports pooling of entire NPAs versus the pooling of only certain rate centers within an NPA. Additionally, the LPSC encourages resolution of the cost-recovery issue prior to the implementation of the national rollout schedule.

Respectfully submitted,

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